

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of  
  
Allocation of Spectrum in the 5 GHz  
Band to Establish a Wireless Component  
of the National Information Infrastructure

RM-8653

AND

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In the Matter of  
  
Petition for Rulemaking To Allocate  
the 5.1-5.35 GHz Band and Adopt  
Service Rules for a Shared Unlicensed  
Personal Radio Network

RM-8648

To: The Acting Secretary

**REPLY OF THE PART 15 COALITION**

The Part 15 Coalition ("the Coalition") submits this reply to the comments filed in the above-referenced matters. In RM-8653 (the "NII Band Petition") and RM-8648 (the "WINForum Petition"), Apple Computer, Inc., and the Wireless Information Networks Forum have asked the Commission to initiate a rulemaking proceeding to allocate spectrum in the 5 GHz range for unlicensed wireless communications technologies.

The response in favor of the two petitions has been overwhelming. Of the approximately 250 comments filed in response to these petitions, all but a handful are in support.<sup>1</sup> The Coalition is encouraged by this show of support, particularly for the NII Band Petition, which advocates an allocation of spectrum that would permit current unlicensed Part 15 technologies to evolve into higher-

<sup>1</sup> Opposition to the proposals was minimal. For instance, Pulson Communications argued that the entire 2.5-8.5 GHz band should be cleared for ultra-wideband technologies. A few parties expressed concerns regarding band sharing arrangements. See, e.g., Comments of Loral/Qualcomm Partnership, L.P.; the American Radio Relay League, Inc.

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bandwidth, advanced information technologies and become an integral part of the NII.

Use of this portion of spectrum for advanced unlicensed services would provide countless public and private benefits. For instance, parties to this proceeding described how the wireless NII Band would promote educational goals, enhance public participation in the political process, benefit small and entrepreneurial companies, link rural and low income areas to the information superhighway, improve healthcare, and conserve energy and other valuable resources.<sup>2</sup> The Coalition is made up of companies that will be involved in each of these various aspects of the wireless information revolution because Part 15 technologies span the entire spectrum of wireless communications services. The comments to these petitions demonstrate that the creation of an NII Band, as described by Apple, would transform the capabilities of unlicensed wireless technologies and enable them to keep pace with advances in computer and communications technologies.

Although technical details regarding band sharing and spectrum etiquette rules remain to be resolved, the NII Band Petition offers the greatest opportunity to promote the roll-out of these new services. Thus, the Coalition supports the petition for rulemaking filed by Apple Computer, Inc., and urges the Commission to act swiftly to initiate a rulemaking proceeding on these issues.

Respectfully submitted,



Henrietta Wright  
W. Kenneth Ferree

GOLDBERG, GODLES, WIENER & WRIGHT  
1229 19th Street, NW  
Washington, DC 20036

Its Attorneys

July 25, 1995

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<sup>2</sup> See, e.g., Comments of the Council of Chief State School Officers; the Center for Democracy and Technology; Cannon Research; the electronic Frontier Foundation; Michael Silverberg; Metricom.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Reply Comments of the Part 15 Coalition, was sent by first-class mail, postage prepaid, this 25th day of July, 1995, to each of the following:

- \* Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554
- \* Hon. James Quello  
Federal Communications Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554
- \* Hon. Andrew C. Barrett  
Federal Communications Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554
- \* Hon. Susan Paula Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554
- \* Hon. Rachelle B. Chong  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554
- \* Ms. Ruth Milkman  
Office of Chairman Hundt  
Federal Communications Commission  
1919 M Street, N.W., Room 814  
Washington, D.C. 20554
- \* Mr. Rudy Baca  
Office of Comm. Quello  
Federal Communications Commission  
1919 M Street, N.W., Room 802  
Washington, D.C. 20554

- \* Mr. Keith Townsend  
Office of Comm. Barrett  
Federal Communications Commission  
1919 M Street, N.W., Room 826  
Washington, D.C. 20554
- \* Mr. David Siddall  
Office of Comm. Ness  
Federal Communications Commission  
1919 M Street, N.W., Room 832  
Washington, D.C. 20554
- \* Ms. Jill Luckett  
Office of Comm. Chong  
Federal Communications Commission  
1919 M Street, N.W., Room 844  
Washington, D.C. 20554
- \* Mr. Richard M. Smith  
Chief  
Office of Engineering & Technology  
Federal Communications Commission  
2000 M Street, N.W., Room 480  
Washington, D.C. 20554
- \* Mr. Bruce Franca  
Deputy Chief  
Office of Engineering & Technology  
Federal Communications Commission  
2000 M Street, N.W., Room 480  
Washington, D.C. 20554
- \* Mr. Mike Marcus  
Office of Engineering & Technology  
Federal Communications Commission  
2000 M Street, N.W., Room 480  
Washington, D.C. 20554
- \* Mr. Robert M. Pepper  
Chief  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, D.C. 20554

- \* Mr. Donald Gips  
Deputy Chief  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, D.C. 20554
- \* Mr. Michael Katz  
Chief Economist  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, D.C. 20554
- \* Mr. Thomas P. Stanley  
Chief Engineer  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, D.C. 20554
- \* Mr. Mark Corbitt  
Office of Plans & Policy  
Federal Communications Commission  
1919 M Street, N.W., Room 822  
Washington, D.C. 20554

Larry Irving, Esq.  
National Telecommunications and Information Administration  
14th Street & Constitution Avenue., N.W., Room 4898  
Washington, D.C. 20232

Mr. Richard D. Parlow  
National Telecommunications and Information Administration  
14th Street & Constitution Avenue., N.W., Room 4898  
Washington, D.C. 20232

Mr. William D. Gamble  
National Telecommunications and Information Administration  
14th Street & Constitution Avenue., N.W., Room 4099A  
Washington, D.C. 20232

Michael Senkowski, Esq.  
Eric W. DeSilva, Esq.  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

Christopher D. Imlay, Esq.  
Booth, Freret & Imlay  
1233 20th Street, N.W., Suite 204  
Washington, D.C. 20036  
Counsel for American Radio Relay League, Incorporated

James F. Lovette  
Apple Computer, Inc.  
One Infinite Loop, MS: 301-4J  
Cupertino, California 95014

Daniel J. Weitzner  
The Center for Democracy and Technology  
1001 G Street, N.W.  
Suite 700 East  
Washington, D.C. 20001

Frank B. Withrow, PhD.  
Council of Chief State School Officers  
One Massachusetts Avenue, N.W.  
Suite 700  
Washington, D.C. 20001-1341

John E. Cunningham  
Paul Wittington  
Pulson Communications  
Suite 1800  
200 Galleria Parkway  
Atlanta, Georgia 30339

Andrew Huang  
Qualcomm, Inc.  
4021 Clairemont Drive  
San Diego, California 92117

Michael Silverberg, D. Phil.  
Stonybrook Health Sciences Center  
State University of New York at Stony Brook  
Stony Brook, New York 11784-8161

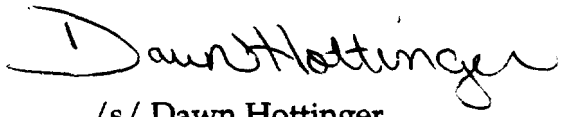
R. Michael Senkowski  
Eric W. DeSilva  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
Counsel to Wireless Information Networks Forum (WINForum)

John T. Scott, III  
William D. Wallace  
Crowell & Moring  
1001 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2505  
Counsel to Loral/Qualcomm Partnership, L.P.

Leslie A. Taylor  
Leslie Taylor Associates  
6800 Carlynn Court  
Bethesda, Maryland 20817-4302  
Counsel to Loral/Qualcomm Partnership, L.P.

Henry M. Rivera  
Larry S. Solomon  
Ginsburg, Feldman & Bress, Chtd.  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Counsel for Metricom, Inc.

David R. Johnson  
Electronic Frontier Foundation  
1667 K Street, N.W., Suite 801  
Washington, D.C. 20006

  
\_\_\_\_\_  
/s/ Dawn Hottinger  
Dawn Hottinger

\* By Hand